

in compliance with the dialing parity requirements of the checklist. Thus, compliance would be achieved on May 15, not July 15.

Q. Does the Company intend to change its implementation plan in response to Staff's position?

A. Although I believe Staff's view is unduly restrictive, the Company does not believe that this issue warrants further debate. Accordingly, the implementation plan will be changed to make mandatory use of 800/888 dialing arrangements effective no later than June 1, 1997.

Q. Will this change negatively impact customers?

A. Not in my opinion. Permissive dialing is typically used to provide customers with a grace period during which they can adjust their calling habits for frequently dialed numbers. Area code changes provide a good example of where there is a need for permissive dialing.

Calls to repair do not fit this model. Calls to 611 are made primarily by residence and small business customers. These customer groups do not call repair on a regular basis; in fact, many customers have no repair

problems at all over many years of service. Thus, only a small subset of Ameritech Illinois' customers would call repair during the two-month permissive dialing period which had originally been planned. Those customers who call 611 after the permissive dialing period has ended are not likely to be the same customers who called during the permissive dialing period. Therefore, I do not believe that permissive dialing in this situation provides significant customer benefits and it can be reduced or eliminated.

Resale

Q. Staff has raised issues relative to the compliance of Ameritech Illinois' resale tariff with its checklist obligations. Would you describe Staff's position?

A. Yes. Mr. Graves has described an investigation which Staff intends to initiate into Ameritech Illinois' resale tariffs. The issues which Staff intends to address include the competitive classification of certain wholesale services; the charges for "as is" conversions; "stripping" and branding of OS/DA services; access to AIN triggers; aggregation of services for purposes of applying volume discounts; and discounts on 9-1-1 trunks (Graves, pp. 3-12).

Mr. Graves then testified that the Commission cannot reach any conclusion as to whether Ameritech Illinois either meets or does not meet its resale checklist obligations until this investigation is completed.

Q. Do you agree with Mr. Graves?

A. Absolutely not. Ameritech Illinois' resale tariffs have been examined twice by this Commission -- once in the Wholesale/Resale proceeding and again in the AT&T arbitration proceeding. The Commission has approved them twice. Moreover, in the AT&T arbitration proceeding, the Commission explicitly found the Company's resale service offering to be in compliance with all applicable requirements of the federal Act. As even Mr. Graves recognizes, several of the issues which Staff apparently intends to revisit (only months after the arbitration process was completed) are issues which the Commission specifically resolved in Ameritech Illinois' favor in the AT&T arbitration proceedings (e.g. OS/DA and access to AIN triggers).

It is clearly Staff's prerogative to initiate a further investigation into Ameritech Illinois' resale tariffs if it believes such an investigation to be warranted. However, until such an investigation has been completed, the Company's tariffs are in effect and

valid. In my opinion, the mere initiating of an investigation cannot be grounds for the Commission to avoid finding that the Company meets the resale checklist requirement, based on its orders to date.

I am also disturbed by the timing of this investigation. The tariffs which Staff intends to investigate were filed with the Commission in September of last year. The Company's position on OS/DA and access to AIN triggers has been clear since its compliance tariffs in the Wholesale/Resale proceeding were filed in early August. Ameritech Illinois worked with Staff since those filings to address a number of issues which Staff raised in its testimony in this proceeding last January. To the Company's understanding, these issues have long since been resolved. To now propose an entirely new investigation -- many months after the tariffs were filed -- and claim that checklist compliance cannot be determined until after the investigation is complete is wholly unreasonable.

Directory Issues

Q. AT&T contends that it is anticipating problems securing listings in Ameritech Illinois' white pages database for customers served over its own facilities because

Ameritech Illinois is planning to use a manual process for populating this database (Evans, pp. 8-9). How do you respond?

- A. Ameritech Illinois offers carriers both a manual and electronic process for providing listing information to its listing database. The interconnection agreement between AT&T and Ameritech Illinois requires that an electronic process be instituted within six months of the date when the agreement was signed. However, it is my understanding that AT&T has not responded to the request of Ameritech Illinois' directory publisher for a meeting between each party's technical staffs to establish an electronic process. Despite this, Ameritech's directory publisher has provided AT&T with file layouts and connectivity options that may be used to provide this information on an electronic basis.

When AT&T decides to use the electronic option to submit listing information, it will have the capability to submit 15,000 to 20,000 listings to Ameritech Illinois' directory publisher on a daily basis for each state. This should address Ms. Evans' concern about the potential for large backlogs. Further, once AT&T is submitting its listing information on an electronic basis, there will be no timing differences in the processing of listing updates received by Ameritech

Illinois' directory publisher from either Ameritech Illinois or AT&T, or any other carrier who submits its information on an electronic basis.

Ms. Evans is also incorrect when she claims there is no notification to AT&T under the manual process that problems have arisen or been cleared. For listing updates provided on paper, Ameritech Illinois' directory publisher contacts the originating carrier either by fax or telephone, identifying the listing update in question and the nature of the problem within one business day of discovering the problem. An electronic error report is used to inform carriers who submit their listing information electronically.

Q. Ms. Evans also contends that certain listings for its resale customers are not being included in the directories in a timely manner (Evans, pp. 7-8). Would you comment?

A. It is my understanding that this issue is integral to the 3E order processing problem that Mr. Rogers addresses in his testimony. Once that problem is corrected, the listings issue will be resolved as well.

Q. TCG states that Ameritech Illinois is not providing nondiscriminatory access to its 911 and E911 services because the process used to load data into the 911 database has not been shown to be error free (Pelletier, p. 8). Do you agree?

A. No. Ameritech Illinois recognizes the importance of maintaining as accurate a 911 database as possible. However, the accuracy of this database is dependent on the quality of information input into it. This information comes from a number of sources in addition to Ameritech Illinois. TCG, for example, is responsible for the accuracy of the input information for its customers. The 911 database is also dynamic and has constant churn. Notwithstanding this environment, Ameritech Illinois' objective is to maintain a 99% accuracy rate. Ameritech Illinois is currently meeting that objective in Illinois. In any event, Ameritech Illinois relies on the same database as TCG. To the extent there are errors, Ameritech Illinois and TCG are impacted equally and there is no discrimination.

Mr. Pelletier refers to a reloading of TCG's Illinois end-user data into Ameritech Illinois' 911 database. Ameritech Illinois is not aware of any such reloading.

Summary of Checklist Compliance

Q. Have you updated your previous schedule to reflect current conditions?

A. Yes. My Schedule 1 show the quantities of various services and network elements which Ameritech Illinois is currently providing to the new LECs in its service territory as of May 1, 1997.

Conclusion

Q. Does that conclude your testimony?

A. Yes.

ILLINOIS CHECKLIST COMPLIANCE SUMMARY

<u>Checklist Item</u>	<u>Current Availability</u>
i) Interconnection	17,901 interconnected trunks as of 3/97
ii) Access to Network Elements	See individual items
iii) Poles, Ducts, Conduits and Rights of Way	900,000 feet of conduit and 106 poles are being used by other carriers as of 12/96
iv) Unbundled Loops	13,931 sold as of 3/97
v) Unbundled Transport	via Dedicated Access Services
vi) Unbundled Local Switching	via AT&T agreement through Most Favored Nation clause
vii) 911, OS and DA	92 911 trunks, 12 operator trunks and 33 directory assistance trunks as of 3/97
viii) White Pages Listings	3,965 as of 3/97 have been provided for the customers of facilities based carriers and resellers
ix) Number Administration	247 CLEC NNXXs have been assigned as of 3/97
x) Signaling and Call Related Databases	29M queries in 1996 to LIDB and 800 databases
xi) Number Portability	5,482 numbers have been ported as of 3/97
xii) Local Dialing Parity	Over 10M inter-network calls completed during January 1997 with full dialing parity
xiii) Reciprocal Compensation	Over 18M minutes completed for CLECs and over 55M completed to CLECs during 1/97
xiv) Resale	30,796 lines had been ordered under a wholesale arrangement as of 4/97